BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of the Joint Application of)
Kenneth Jaeger and Blue Lagoon, LLC)
Authorizing Kenneth Jaeger to Transfer) Case No. SM-2008-0188
His Assets to Blue Lagoon, LLC., and for the)
Establishment of a Rate	ý
Applicant,))
)

MOTION TO INTERVENE

COMES NOW Salt River Resort, LLC, by and through its attorney, David C. Edmonds, and for its Motion to Intervene, state as follows:

- 1. Salt River Resort, LLC, is a Missouri limited liability company, with its primary address located at 19883 Opry Place Monroe City, Ralls County Missouri 63456 ("Intervener").
- 2. Salt River Resort, LLC has two (2) members of the limited liability company, Michael Knepper and Nancy Knepper.
- 3. Salt River Resort, LLC owns and operates a RV campground, convenience store, and outdoor storage facility at its primary address, 19883 Opry Place, Monroe City, Ralls, County, Missouri ("Intervener's Property").
- 4. Intervener has an interest in the Ken Jaeger/Blue Lagoon, LLC application as the Intervener's Property is located adjacent to, and has its sewer pipes connected to the lagoon and sewer system which is the subject of Ken Jaeger/Blue Lagoon, LLC's application.
- 5. Intervener has an interest in this application that is different from the general public in that the lagoon and sewer system is designed to only serve a limited number of properties in the geographical area of the lagoon and that Intervener's Property is one of the limited numbers of

properties to be served.

6. It is Intervener's understanding and belief that when the lagoon was initially constructed

and granted a construction permit to by the State of Missouri to build the lagoon, the Intervener's

Property was listed as a proposed user of the lagoon and sewer system.

7. Intervener could be adversely affected by the granting, denying or imposition of any

conditions on the above application.

8. Although Intervener in favor of the granting of license for the operation of the lagoon and

sewer system, and in favor of the operating entity that will operating the lagoon and sewer

system being under the regulations of the Public Service Commission of the State of Missouri,

Intervener is unsure, at this time, of the position it will take on the application of Ken

Yeager/Blue Lagoon, LLC until it has had more time to review the above application and

investigate the applicants' ability to operate the lagoon and sewer system.

WHEREFORE, Intervener Salt River Resort, LLC prays for an order allowing it to

intervene in the Ken Jaeger/Blue Lagoon, LLC Joint Application and for such further judgment

and relief to which Intervener may be entitled and for such further relief as the Court deems just

and proper.

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Bv:

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the forgoing was sent by facsimile, electronic delivery and United States mail, postage pre-paid, this 3rd day of January, 2008, to the following counsel of record:

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